

NARRATIVE INSPECTION REPORT DOCUMENT

Date of Inspection March 18, 1991

Inspector: Rich Johnson

Site Code: LPC No. 1178020003

County: Macoupin

Site Name: Brighton/Brighton Landfill

itemized violations

GENERAL REMARKS

The following information is provided in the same sequence as the questions shown on the "RCRA Inspection Narrative".

No. 1. Describe the products made, services provided, etc.

The facility has only operated as a landfill. Brighton Landfill has accepted both hazardous and non-hazardous waste. Under a Circuit Court Order, the landfill was to cease accepting any waste after December 20, 1985 (see Item 4 for details). The facility had already ceased taking hazardous waste by November 8, 1985, because their interim status was terminated and they were unable to qualify for a RCRA permit.] ←

No. 2. Describe how and where each waste has been accumulated and/or stored.

The landfill occasionally has run-off water that accumulates in two locations. One area where the water accumulates is just north of Site 2. The other area is in the southwest corner of Site 2. Landfill personnel eventually discharge the water off-site to adjacent drainage systems that are tributaries to streams.

Previous inspections found waste oil accumulated on-site. Waste lubricating and crankcase oil have been generated from the landfill's earthmoving equipment when repairs necessitated the replacement of the oil. Mr. Cottingham said routine maintenance to change oil on the equipment does not occur. According to Mr. Cottingham, if any oil is generated from equipment at the landfill, he takes it to his farm to use on his farm implements. The last time any oil was generated was said to be about a year ago. No containers of waste oil were found on-site. It was also indicated by Mr. Cottingham that the waste oil furnace in the office/equipment shed is no longer being used. They are heating the building with propane.

No. 3. Describe how and where each waste is or has been treated and/or disposed.

The facility has only operated as a landfill. There are no accurate records of where the hazardous wastes were placed.



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The following is a summary of the wastes accepted at the landfill (by generators). The following information had previously been reviewed from the Agency microfiche. Included on the list are those wastes which were represented as hazardous on the microfiche and that had an entry showing gallons accepted at the landfill. It should be noted that the landfill ceased taking hazardous waste just prior to November 8, 1985. The landfill stopped accepting any waste by December 20, 1985, in response to a Circuit Court Order 81-CH-10, signed by Judge Joseph Koval.

Olin (Alton, Illinois)

<u>Authorization No.</u>	<u>General Waste Name</u>	<u>Hazardous Waste No.</u>
79-2386	Shot tower cob meal	D008
81-1744	Walnut shells	D008
81-2607	Baghouse dust	D006
82-1766	Pigment composite	D008
81-0631	Ballistic sand	D008
82-2246	Shell components	D008
82-0867	Bur saddles	D008
81-2472	Shot tower refractory brick	D008
83-0623	Zone 3 baghouse dust	D008
83-0661	Zone 3 incinerator ash	D008
83-0922	Pre-heat salt	D005
-	High speed salt	D005
-	Quench salt	D005
83-0992	Zone 17 baghouse bags	D006
81-0633	Lead contaminated filters	D008
82-0899	#3 standard red pigment #400	D006
81-0863	Zone 4 incinerator residue	D008
82-0868	T-242 kill sump sludge	D008
81-1968	Zone 6 WWT vacuum filter sludge	D008
81-2481	WW tumbling media	D008
82-0871	Zone 4 MRF	D008
82-2246	Lead wads	D008
-	Zone 17 settling pit sludge	D008

Owens Illinois (Alton)

82-0635	Furnace checker dust	D006
-	Oil base ink	?

Amoco (Wood River, Illinois)

83-1336	Jet fuel tank bottoms	D008
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Duncan Foundry & Machine Works (Alton)

83-1335	Baghouse dust	D008
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<u>Authorization No.</u>	<u>General Waste Name</u>	<u>Hazardous Waste No.</u>
	<u>W. H. Maze Co.</u>	
83-2101	Chromate rinse	D007
	<u>Oliver L. Anderson Hospital (Maryville, Illinois)</u>	
-	Incinerator ash	D006 & D008
	<u>Shell Oil</u>	
-	Catalyst fines	-
	<u>Precision National Corporation (Mt. Vernon, Illinois)</u>	
-	Chrome Sludge	D007
	<u>Wastex (East St. Louis, Illinois)</u>	
-	Waste sealer B	D008
	<u>Trade Waste Incinerator (Sauget, Illinois)</u>	
83-1084	Roasted gravel	D008
	<u>FMC</u>	
-	Heavy paint sludge	-
	<u>Laclede (Alton, Illinois)</u>	
-	Digested sludge	-
-	Baghouse dust	-

No. 4. Describe and explain any unusual events, occurrences, or applications of the regulations.

The Circuit Court Judgment Order, signed 12/20/85, required that the landfill:

- Cease taking any further refuse at the site. This had been complied with.
- Seal the southwest trench along Site 2 and the monitor wells within 180 days (about 6/18/86). The landfill has completed backfilling most of the trench with soil. No. additional cover placement is contemplated by Brighton Landfill. Mr. Evans has previously said that no waste had been deposited in the trench. All monitoring wells have been sealed, according to Mr. Evans.

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- c. Cleanup randomly dumped refuse located southeast of the entrance. It was previously noted that the refuse had been cleaned up.
- d. Submit closure progress reports to the Court and Plaintiffs. The first report was due 120 days after the Order (about 4/19/86) and the second report 240 days after the Order (8/17/86). The Court Order did not require the landfill to submit these reports to the Agency. Copies of the analyses were available for review at the landfill.
- e. Sample and analyze surface water beginning February 1986 and thereafter every May, August, November and February through the post-closure period.
- f. Complete closure activities by 12/19/86. In talking to Mr. Evans it was learned that he has gone to Circuit Court for extensions of the closure completion date. The Court approved closure plan required 2 feet of compacted low permeable cover with 2 inches of topsoil. Mr. Evans indicated the required amount of soil has been applied. Under the Court approved closure plan the cover was to be probed subsequent to compaction of final cover to assure the required two foot of final cover. An engineering report by M. Rapps and Associates certifies that the closure activities have been completed in accordance with the closure plan approved by the Circuit Court.

On August 8, 1988, the Circuit Court determined that the landfill had been closed in accordance with the Court approved closure plan and directed the site to begin 30 years of post-closure care.] ←

The landfill has also be subject to an enforcement case by the USEPA. In a Consent Agreement and Final Order (V-W-R-0-82) signed September 10, 1985, the owner/operator stipulated that they would:

- a. Pay a \$15,000 penalty. This has been done.
- b. Provide the USEPA with a summary of the groundwater monitoring data obtained during the landfill's interim status period.
- c. Provide the USEPA with a plan and implementation schedule for a groundwater monitoring program capable of providing the information required in 270.14(c)(2) through 270.14(c)(4). The landfill has submitted a "Groundwater Monitoring and Contamination Assessment Plan" for Com-Pak that was developed by John Mathes & Associates in 1985. It appears that the plan was never implemented. A new groundwater assessment plan developed by Ms. Roberta Jennings (dated April 1989) has been submitted to the USEPA and the IEPA for review.
- d. Submit to the USEPA information required by 270.14(c)(2) through 270.14(c)(8). The landfill's "Groundwater Monitoring and Contamination Assessment Plans for Com-Pak" submitted to the IEPA and USEPA indicates it provides information required in 270.14(c)(2) through 270.14(c)(4).

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- e. Submit to the IEPA a plan for a groundwater monitoring program. This is discussed in paragraph (d).
- f. Achieve compliance with the following within 30 days of the signing of the Consent Agreement and Final Order:
 1. Conduct inspections of the incoming hazardous waste to assure that it matches the identity of the waste specified in the manifest. This is no longer applicable because the landfill no longer receives wastes.
 2. Develop and follow a written analysis plan for collecting runoff liquid. The facility has developed a plan called the "Excess Rainwater Analysis/Disposal Plan." However, the present plan has not been modified to indicate TCLP as the test method instead of EP Toxicity.
 3. Install an artificial barrier which completely surrounds the facility. This is deemed complied with.
 4. Train all facility personnel to perform duties in a way that assures the facility's compliance as required in 725.116(a). There has been no training conducted at the facility since March 21, 1985.
 5. Prepare and maintain personnel training records at the facility which document the training and job experience of each person dealing with hazardous waste management and emergency response, as required by 725.116(d)(4). The facility had records of past training conducted (though there has been no recent training).
 6. Have a person that will be available or on call with the responsibility of coordinating all emergency response measures. Mr. Frank has received training and is the site's designated primary Emergency Coordinator.
 7. Retain manifests at the facility for at least 3 years. This is being complied with.
 8. Make arrangements or design modifications to allow for collection of runoff from active portions of the facility. The landfill was found to have erosion channels around the perimeter of the active portion which would indicate surface water runoff is leaving the site. Water runoff was exiting the site during the landfill from a culvert in the southeast region of Site 2.
 9. Prepare a map which indicates the exact locations and dimensions, including depth of each cell with respect to permanently surveyed benchmarks and the contents and approximate location of each hazardous waste type within the cells. The map showing the approximate locations of the cells and the information on the "Generator Sheets" are not sufficient to pinpoint the location of hazardous wastes in the landfill.

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The landfill has tried to comply with the Court Order, which in turn means that it was not able to comply with the Consent Agreement and Final Order. The landfill is currently trying to implement the post-closure plan approved by the Court.

No. 5. Describe any exemptions from the regulations the facility qualifies or may qualify for.

Currently, the waste oil generated from servicing on-site equipment is being reused by Mr. Cottingham in lubricating his farm equipment. The small amount generated is being reused in a manner similar to its original use.

The owner/operator sent a "Notification of Hazardous Waste Activity" dated August 18, 1989, and a Part A application dated November 18, 1980, to obtain interim status. They have revised the Part A twice since that time -- once in March 4, 1982, and the other time April 9, 1983.

The process codes on the latest Part A (April 9, 1983) included the following:

D80 - landfill disposal
S01 - storage in containers
S02 - storage in tanks
T04 - treatment not otherwise specified.

Of the above, the facility has only actually conducted a landfill operation. The other process codes were proposed changes that never took place.

No. 7. List any attachments to be included in the inspection report.

None

No. 8. Summarize the apparent violations.

- 703.121(b) - The facility does not have a post-closure permit.
- 722.111 - A hazardous waste determination has not been made of the landfill's run-off water.
- 725.116(b) - Mr. Cottingham has never received hazardous waste training.
- 725.116(c) - Personnel are not receiving annual training.
- 725.116(d) - A record of Mr. Cottingham's job title and job description was not available for review.

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- 725.131 - The facility was not maintained to minimize the possibility of release of hazardous waste or hazardous waste constituents. The collected runoff water was discharged prior to being analyzed.
- 725.152(d) - The emergency coordinator's list was not deemed adequate because Mr. Cottingham was not included.
- 725.153(b) - A contingency plan with Mr. Frank's new mailing address had not been submitted to local emergency response organizations.
- 725.154(d) - The emergency coordinator list changed because of Mr. Frank's new mailing address but the contingency plan had not been amended. Mr. Frank changed the facility's contingency plan during the inspection.
- 725.155 - There is to be one person either on the facility premises or on call that can respond to an emergency in a relative short period of time. Mr. Cottingham is at the facility but has not been considered an emergency coordinator.
- 725.175 - Facility Annual Reports had not been submitted for either 1989 or 1990.
- 725.212(d)(1) - The facility's closure plan had not been sent to the Agency with the intention of review 180 days prior to the date on which the owner or operator expects to begin closure.
- 725.212(d)(3) - The facility was to have submitted its closure plan to the Agency no later than 15 days after 1) termination of interim status or 2) an issuance of a judicial decree or Board order to cease receiving hazardous waste or close. This had not been done.
- 725.218(e) - The facility's post-closure plan was to have been sent to the Agency at least 180 days before the date on which the owner or operator expects to begin closure or within 15 days after 1) termination of interim status and/or 2) an issuance of a judicial decree or Board Order to cease receiving waste or close. This has not been done.
- 725.242(b) - The facility has not adjusted their closure cost estimate annually.
- 725.244(b) - The facility has not adjusted their post-closure cost estimates annually.
- 725.402(b) - The facility was not maintaining a runoff management system to collect and control all of the generated runoff.

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- 725.409 - The facility had not provided enough information to identify the exact locations of hazardous wastes within the landfill.

No. 9. Provide any other pertinent comments.

Mr. Cottingham was on-site when I arrived. Mr. Frank, the Primary Emergency Coordinator, arrived shortly after I did. I spoke to Mrs. Donna Evans, wife of Mr. Gene Evans, on the telephone during the inspection. I observed several pieces of earthmoving equipment at the landfill during the inspection (see photographs 1 and 2). Mr. Cottingham indicated the following equipment was operable:

Tractor pulled scraper (said to have a 15 cubic yard capacity)
Terex bulldozer
Roadgrader
Insley backhoe
Fiat Allis end-loader
Small rubber-tired tractor

Other equipment included a large bulldozer, a 25 cubic yard self-loading scraper, etc. None of the equipment was being operated at the time of the inspection.

Mr. Cottingham and I walked around the landfill during the inspection. The landfill has two areas which have received permits from the IEPA to develop and operate as a sanitary landfill. Both sites (which are contiguous) have received hazardous waste for disposal. The sites have also received general refuse and non-hazardous special wastes. For purpose of describing areas of the landfill, the areas will be identified as Site 1 (LPC No. 1178020001) and Site 2 (LPC No. 1178020003).

Site 1 and 2 have received cover and vegetation has been established on them.

Site 2 has been noticeably filled above the adjacent ground level (see photos 3, 4, 9, 10, 11, 12, 17 and 22).

While walking along the south edge of Site 1 and 2 several erosion channels were observed (see photos 6 and 7). These erosion channels continued south under the landfill's perimeter fence. The fairly deep channels indicate that runoff from the higher fill area to the north routinely leaves the site. South of the site is a public road drainage ditch.

At one time a deep L-shaped trench had been dug along the south and west sides of Site 2. Soil had been used to fill this trench. However, this is still a low area in the filled trench that allows water runoff to collect along the south side of Site 2 (see photos 9, 10 and 11). An underground culvert setting in the southern portion of Site 2 allows accumulated water to

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discharge to the public road's drainage ditch (see photo 8). A steel plate has been placed on the south opening of the culvert to prevent accumulated water in the low southern portion of Site 2 from exiting the culvert. The culvert's plate can be manually removed to allow the water to discharge. Mr. Cottingham had partially removed the plate and water from the landfill was exiting the site to the adjacent roadside ditch. He said he had opened the plate on the culvert about a month ago. This was done, according to Mr. Cottingham, because he was concerned that the accumulated water at the landfill might have spilled over the south side and damaged the adjacent township road. He indicated prior to releasing the water that it had filled up low areas along the south, west and north sides of Site 2. Mr. Cottingham said he would have to allow the water to completely drain before closing the plate on the culvert again.

A trench had been dug north of Site 2 at one time. This trench has also been backfilled with soil (see photo 12). Runoff from the north face of Site 2 partially flows to this low area on the north side. An underground culvert is located in the northeast region of the low area. A metal plate has been installed on the north opening of the culvert (see photo 15) to prevent any accumulated runoff from discharging to a drainage ditch to the north (see photo 16). It was noted that a small stream of water was flowing in the drainage ditch north of the culvert. While the plate was secured on the end of the culvert, some of the standing water in the other side of the earthen dike was apparently discharging into the ditch.

Cover material near the northwest corner of Site 1 had been disturbed. Mr. Cottingham said he had been cutting the vegetation in the area with a tractor when the wheels made these deep depressions.

The northern fill face of Site 1 shown in photo 18 was observed to be covered with vegetation growing on it. A few deep erosion channels were observed in the north face. No refuse had been uncovered yet.

The new creek channel placed along the north side of Site 1 (see photos 19 and 20) was inspected. No leachate stains, seeps or flows were detected. It was noted that some of the south bank and north bank had sloughed, making the creek channel wider.

An erosion channel was observed in the east central region of Site 1 along a slope. The channel had not cut down to refuse (see photo 21).

Two concrete manhole covers were observed north of the landfill office/equipment shed. One of the covers was lifted off to observe what was beneath. The opening beneath the cover showed a small hole with a small amount of water in the bottom. Mr. Cottingham said the structure closest to the building was probably a filter for a cistern. The filter, according to Mr. Cottingham, would probably be filled with sand or gravel. As water filled the filter, it would flow to the other underground structure (the cistern itself).

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About 50 feet north of the office/equipment shed was another opening in the ground. Out of the opening was a hose from a portable pump. Mr. Cottingham said the liquid observed in the opening was septic waste that was in a septic tank. The shed has one toilet and one sink apparently connected to the underground tank. Mr. Cottingham said that the tank would probably be about 10 feet high. I observed 3 to 5 feet of what appeared to be water in the tank. Mr. Cottingham indicated that the landfill had the tank contents removed not long ago. He said Mr. Walker had made the arrangements. There was a large 6 inch portable pump set up close to the septic tank. Mr. Cottingham said a previously 4 inch pump had been stolen from the site.

Miscellaneous

A new draft Consent Order is being reviewed by USEPA concerning Brighton Landfill. In a telephone conversation with Mr. Jonathan Cooper (with the USEPA's Region V's Enforcement Section) on March 21, 1991, he indicated USEPA Headquarters (Washington D.C.) currently had the draft Consent Order. Apparently, numerous agencies and persons have to sign off approving the draft Consent Order. These were said to include:

1. USEPA Regional Office
2. USEPA Headquarters
3. U.S. Department of Justice
4. Illinois Attorney General's Office
5. Macoupin County Officials
6. Com-Pak Engineering, Inc.

The Circuit Court that originally approved the present closure and post-closure of the landfill will also have to be included in the proceedings.

About 7 55-gallon drums were observed south of the office. Three of the drums were pushed to determine if they held anything. Each of the drums apparently contained some type of liquid. Mr. Frank said that drums contained "roof" paint. He indicated that Mr. Cottingham was to use the paint for the farm shed located northwest of Site 2.

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